

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

MM Mechanical, LLC,

Debtor.

Case No. 23-23010-kmp

MOTION TO SHORTEN TIME AND REQUEST FOR EXPEDITED HEARING

The above-named Debtor, MM Mechanical, LLC, by its attorneys, Krekeler Law, S.C., hereby moves the Court to shorten the time for notice and requests a hearing on an expedited basis pursuant to 11 U.S.C. § 102(1) and Federal Rules of Bankruptcy Procedure (“FRBP”) 9006(c)(1) and 9007 on Debtor’s Motion to Convert Involuntary Chapter 7 Case to a Case Under SubChapter V of Chapter 11 (the “Motion to Convert”). The Debtor requests that an order be entered requiring that any objection to the Motion to Convert be received by one business day prior to the commencement of a hearing to be scheduled by the Court. This motion is warranted for the following reasons:

1. The Debtor is currently prohibited from operating and its bank accounts have been frozen by the Chapter 7 Trustee.
2. Converting the case on an expedited basis will ensure the best opportunity to maximize the value of the estate for the benefit of all creditors. If all assets of the Debtor are liquidated through the Chapter 7 Trustee, creditors may not be paid in full as the assets are likely insufficient when accounting for administrative costs of a liquidation and the possible detriment a liquidation could have on the collectability of accounts receivable.
3. Conversion will also afford the Debtor the opportunity to advance a reorganization of its enterprise so as to maintain a going concern value and the retention of all employees. Without the expedited relief, the Debtor may lose these essential employees or vendors and could be irreparably harmed.

WHEREFORE, the Debtor respectfully requests that the Court enter an order approving a shortened notice period whereby any objection to the Motion to Convert must be received one business day prior to the commencement of a hearing to be scheduled by the Court.

Dated November 3, 2023.

KREKELER LAW, S.C.

By: /s/ John P. Driscoll
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